


Exhibit E

<p style="text-align: right;">Page 3208</p> <p>1 and the accompanying report at 7038.</p> <p>2 THE COURT: Any objection?</p> <p>3 MR. PENDELL: We have no objection, Your</p> <p>4 Honor.</p> <p>5 THE CLERK: Admitted into evidence.</p> <p>6 (The referred-to document was marked into</p> <p>7 evidence as Defendants' Exhibit 7044 and Exhibit 7038.)</p> <p>8 MS. BROWN: Just for the record, we'll move in</p> <p>9 7044, 7038.</p> <p>10 BY MS. BROWN:</p> <p>11 Q Is this a letter and the report from</p> <p>12 Dr. Pooley regarding the Italian talc mines that you are</p> <p>13 familiar with, Dr. Sanchez?</p> <p>14 A Yes, it is.</p> <p>15 Q Okay. And if we look at this letter from</p> <p>16 Dr. Pooley, he talks about his work on examining Italian</p> <p>17 talc, correct?</p> <p>18 A Yes.</p> <p>19 Q And tell us what Dr. Pooley's conclusions were</p> <p>20 of examining the talc mine and old bottles of Johnson's</p> <p>21 Baby Powder dating back to 1949?</p> <p>22 A Yeah, it says, again, without going into the</p> <p>23 full report, but he summarizes here, no chrysotile was</p> <p>24 found in the mine or in the samples taken. Some</p> <p>25 tremolite was located, but was not asbestiform in</p>	<p style="text-align: right;">Page 3210</p> <p>1 satisfied that Windsor's product is free of asbestos.</p> <p>2 That has always been our opinion and continues to be our</p> <p>3 opinion based on over 15 years of closely examining this</p> <p>4 product, signed by Ian Stewart.</p> <p>5 Q And in terms of your opinion, Dr. Sanchez,</p> <p>6 having visited some of these mines, having tested in the</p> <p>7 ordinary course and having tested hundreds of bottles in</p> <p>8 litigation, what is your opinion as to whether Johnson's</p> <p>9 Baby Powder had asbestos?</p> <p>10 A No, we've not -- I would not conclude that it</p> <p>11 contains asbestos because we have not found any.</p> <p>12 MS. BROWN: Thanks very much, Dr. Sanchez. I</p> <p>13 don't have any other questions.</p> <p>14 THE COURT: Cross?</p> <p>15 MR. PENDELL: Yes, thank you, Your Honor.</p> <p>16 CROSS-EXAMINATION</p> <p>17 BY MR. PENDELL:</p> <p>18 Q Good morning, Dr. Sanchez. You and I met</p> <p>19 briefly yesterday.</p> <p>20 A Yes.</p> <p>21 Q I have some questions for you. Yesterday when</p> <p>22 you started your testimony, you mentioned that you live</p> <p>23 in Utah; is that right?</p> <p>24 A That's correct.</p> <p>25 Q And RJ Lee and the lab is outside Pittsburgh,</p>
<p style="text-align: right;">Page 3209</p> <p>1 character and has not been detected in the 0000 talc</p> <p>2 imported into Great Britain for the past year, nor in</p> <p>3 shipments dating back to 1949.</p> <p>4 Q And when you visited the Italian talc mines</p> <p>5 and when you tested samples of Johnson's Baby Powder</p> <p>6 that used talc from the Italian talc mine, did you find</p> <p>7 asbestos?</p> <p>8 A No, I did find non-asbestos tremolite in some</p> <p>9 of those materials, but no chrysotile and no amphibole</p> <p>10 types of asbestos.</p> <p>11 Q And the final document I want to show you,</p> <p>12 Dr. Sanchez, is D7216, another letter from McCrone</p> <p>13 laboratories about the testing that they were doing on</p> <p>14 the Vermont talc.</p> <p>15 A Okay.</p> <p>16 Q I want to direct your attention down to the</p> <p>17 last paragraph where Mr. Stewart talks about testing of</p> <p>18 this talc for the prior 15 years. Do you see that?</p> <p>19 A I do.</p> <p>20 Q And what was the conclusion of McCrone</p> <p>21 Associates in 1987 based on the prior 15 years of</p> <p>22 testing?</p> <p>23 A It goes through some language here, but</p> <p>24 there's a sentence here that says the Illinois EPA wrote</p> <p>25 to Windsor Minerals to the effect that they were</p>	<p style="text-align: right;">Page 3211</p> <p>1 Pennsylvania; is that true?</p> <p>2 A That's correct.</p> <p>3 Q And I recall counsel saying something along</p> <p>4 the lines of, "How does that work?" And you said, "It</p> <p>5 works."</p> <p>6 So let me ask you: You don't go to the lab</p> <p>7 every day in Pittsburgh from where you are in Utah,</p> <p>8 correct?</p> <p>9 A No, I don't.</p> <p>10 Q You don't go every week, do you?</p> <p>11 A I go as needed.</p> <p>12 Q When is the last time you've been there doing</p> <p>13 lab work in that lab?</p> <p>14 A Two weeks ago.</p> <p>15 Q How about the time before that?</p> <p>16 A I did some work in another laboratory facility</p> <p>17 of ours in March of last year, and then again towards</p> <p>18 the end of 2022.</p> <p>19 Q Okay.</p> <p>20 A I also have access personally to polarized</p> <p>21 light microscopy. I do a lot of work doing PLM at my</p> <p>22 house.</p> <p>23 Q I apologize, I don't mean to step on you, but</p> <p>24 my question was about the RJ Lee lab. So you went one</p> <p>25 time in the past year; is that right?</p>

<p style="text-align: right;">Page 3212</p> <p>1 A No, I've been to two different laboratory 2 facilities for RJ Lee Group to conduct work, and I spent 3 many hours on Zoom calls working with analysts whether 4 running microscopes and working with them remotely. 5 Q I'm not interested in Zoom calls, sir. I want 6 to know how many times you were physically in the lab. 7 A Twice in the last year. Two different trips 8 on multiple days. 9 Q Isn't it true, Doctor, that the reason it 10 works that you are in Utah and not at the lab is 11 because, actually, what you've been doing for about the 12 last ten years is you've been a professional witness in 13 litigation like this; isn't that true? 14 A At different times, it has dominated my work, 15 my professional life, yes. My work with Johnson & 16 Johnson started in 2017 in this capacity. 17 Q Let's look at that. I've got a copy here for 18 you. 19 This is a list, I believe, that you created of 20 all litigation that you've been involved in since 2014. 21 You are familiar with that, right? 22 A Yes, this is a list of all the depositions and 23 trial testimonies that I've given. 24 Q So looking at this list going all the way back 25 to 2014, I'm not good at math, but I generally do okay</p>	<p style="text-align: right;">Page 3214</p> <p>1 to disclose the fact that you've been hired, correct? 2 A Yes, this is only where there's records of 3 deposition or trial testimony, yes. 4 Q So if you and I came back here in a year and I 5 got an updated list, there would probably be more 6 matters on that a year from now than there are right 7 now; is that fair? 8 A Yes, I continue to work, so I would have 9 additional testimony given over the course of the year. 10 Q In at least some of these 143 cases plus the 11 trials, the ones that we have on your list, you had to 12 write and submit an expert report in some of those 13 cases, correct? 14 A Depending on the jurisdiction, yes, I would 15 have various -- it would really depend on the case. But 16 yes, there would be generally a general expert report as 17 I would call it, and then if the particular case 18 involved production of samples for testing or other 19 issues in the case which would require additional work, 20 there may be other reports as well. 21 Q And it takes time to write reports, doesn't 22 it? 23 A Some reports take a lot of time. As I just 24 referenced to the general report, so my general report 25 summarizes the geology of the mines, summarizes all the</p>
<p style="text-align: right;">Page 3213</p> <p>1 on counting. I counted that you've testified, in the 2 last ten years, 143 times just in depositions in 3 litigation like this; is that right? 4 A Yeah, that's the number, yes. 5 Q Okay. And you've also testified 31 times in 6 trials in courtrooms all over the country just like 7 you're doing today, correct? 8 A That's correct. 9 Q And actually, I think today makes 32, today 10 and yesterday. 11 A It would not be on the list, correct. 12 Q Do you know how much of your testimony over 13 the last ten years has been on behalf of Johnson & 14 Johnson? 15 A Not offhand. I'd have to go and check the 16 records for each of the cases. The majority of it would 17 be with Johnson & Johnson though. 18 Q And by the way, this list that was given to us 19 is just the cases that you've actually been disclosed 20 in, correct? 21 A This is where I've given either deposition 22 testimony or trial testimony, yes. 23 Q So there are other cases where, for example, 24 Johnson & Johnson may have already hired you to do some 25 work, but it hasn't gotten to the point where they have</p>	<p style="text-align: right;">Page 3215</p> <p>1 testing that I have done. That report is a standard 2 kind of report based upon the past work I've done. 3 Q Okay. But sometimes you also do case-specific 4 reports, correct? 5 A Depending on the nature of the case, I may 6 have additional rebuttal reports or additional testing 7 reports that come in which would -- again, just 8 depending on the case and the work required. 9 Q And I assume it takes you time to draft some 10 of those reports from scratch, correct? 11 A It can, yes, depending on the report and what 12 goes into it. 13 Q Sometimes more than ten hours? 14 A Some of them could be much more than ten 15 hours. 16 Q Sometimes them more than 20 hours, right? 17 A With all the testing, some of them much more 18 than 20 hours. 19 Q So in addition to the report writing and the 20 actual testifying at depositions and trials, you've got 21 to carve out time to meet with the corporate defense 22 lawyers that hire you to help prepare you to come into 23 courtrooms and depositions to testify; is that right? 24 A To some extent, yes. 25 Q You just don't wing those, right? You spend</p>

<p style="text-align: right;">Page 3400</p> <p>1 IUDs. And the point of the IUD was to create this 2 chronic inflammatory state in the endometrium so that an 3 embryo could never implant. 4 And the studies on IUDs and the risk of 5 ovarian cancer actually show a decrease in the risk of 6 ovarian cancer in women that used either the hormonal or 7 the nonhormonal IUDs. And so, again, I think that 8 refutes the hypothesis that inflammation is causing 9 ovarian cancer, because IUDs are creating a chronic 10 inflammatory state. 11 So if you are chronically inflamed, then why 12 isn't the risk of ovarian cancer higher if inflammation 13 is causing ovarian cancer? 14 THE COURT: Thank you. We'll be in recess 15 until tomorrow morning at 9:30. 16 Remember not to discuss the case amongst 17 yourselves or with anyone else. No social media. 18 Enjoy your night. 19 (The jurors exited the courtroom.) 20 THE COURT: Doctor, you may step down. You 21 are still on the witness stand. You may not 22 discuss your testimony with anyone. 23 The Court will be in recess until tomorrow 24 morning at 9:30 a.m. 25 (The proceedings recessed at 4:32 p.m.)</p>	<p style="text-align: right;">Page 3402</p> <p>1 CERTIFICATE 2 3 I, CHRISTINE SAVOUREUX-MARINER, Florida 4 Professional Reporter, certify that I was authorized 5 to and did stenographically report the foregoing 6 proceedings and that this transcript is a true 7 record of the proceedings before the Court. 8 I further certify that I am not a 9 relative, employee, attorney, or counsel for any of 10 the parties, nor am I a relative or employee of any 11 of the parties' attorney or counsel connected with 12 the action, nor am I financially interested in the 13 action. 14 15 Dated this 28th day of February, 2024. 16 17  18 CHRISTINE SAVOUREUX-MARINER 19 Florida Professional Reporter 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 3401</p> <p>1 (Continued in Volume XV.) 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	